

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**OBJECTION OF DISCOVER BANK TO THE CONFIRMATION OF THE PLAN**  
**DATED APRIL 10, 2025 (DOCKET NUMBER 5)**

DISCOVER BANK ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed Chapter 13 Plan ("Plan") filed by Larry Bonner, Jr. ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 3624 Fisk Ave, Phila, PA 19129 ("Property").
2. Creditor initiated foreclosure proceedings by the filing of a Complaint in Philadelphia county and having case number 230502709.
3. Judgment was entered December 10, 2023.
4. The Property sold at sheriff's sale held on September 10, 2024.
5. Debtor's Plan treats Creditor's secured claim as long term debt that proposes to cure the arrearage.
6. The Sheriff's sale is valid. Debtor lost the ability to cure the default when the Sheriff's sale was completed pursuant to 11 U.S.C. §1322(c)(1).

7. Creditor objects to any inclusion in the Plan.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/Stephen R. Franks  
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The case attorney for this file is Stephen R. Franks.  
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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** : Case No.: 25-11401  
Larry Bonner, Jr. : Chapter 13  
Debtor(s) : Judge Ashely M. Chan  
\*\*\*\*\*  
Larry Bonner, Jr. : Date and Time of Hearing  
Kenneth E. West :  
Movant, :  
vs : Related Document No. 5  
DISCOVER BANK :  
Respondents. :  
:

**CERTIFICATE OF SERVICE**

I certify that on the date of filing, a copy of the foregoing Original Plan was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Kenneth E. West, Chapter 13 Trustee, [ecfemails@ph13trustee.com](mailto:ecfemails@ph13trustee.com)

BRAD J. SADEK, Attorney for Larry Bonner, Jr., brad@sadeklaw.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S.

Mail to the following:

Larry Bonner, Jr., 3624 Fisk Avenue, Philadelphia, PA 19129

/s/Stephen R. Franks